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April 23, 2021

Via ECF

Honorable Magistrate Judge Katharine H. Parker  
United States District Court – Southern District of New York  
Daniel Patrick Moynihan – United States Courthouse  
500 Pearl Street  
New York, New York, 10007

**MEMO ENDORSED**

**Re: Eusebia Reneyda Cuello v. Healthfirst PHSP, Inc., No. 20-CV-10177 (JPO)**  
**Request for an Adjournment of Case Management Conference & Fact Discovery Due Dates**

Dear Magistrate Judge Parker:

I am counsel for Plaintiff Cuello in the above-referenced matter. I write to you with Defendant's consent pursuant to your Individual Rules to seek an adjournment of the April 28, 2021, case management conference and the fact discovery due dates.

This is my second request for an adjournment. The first request was due to a scheduling conflict, and the Court granted the adjournment. I seek this adjournment because currently all fact discovery, including depositions, are due by June 16, 2021, which I will not be able to meet. My practice experienced a very busy month of April and, forthcoming, will experience an equally busy month of May.

If your honor would prefer that these fact discovery due dates be addressed at the April 28, 2021, conference, counsels will be present. Otherwise, I request that the conference and due dates be moved back by five weeks, whereby the conference would be held on June 2, 2021, and the fact discovery deadlines, including depositions, be moved to July 21, 2021. Defendant's counsel consents to these proposed dates. Yet, if these proposed conference and discovery dates do not work for the Court, I request that the Court select the dates.

I thank you for your consideration.

Respectfully submitted,  
/s/ G. Oliver Koppell  
G. Oliver Koppell

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Cc: David Warner, Esq., via ECF

**APPLICATION GRANTED:** The telephonic Initial Case Management Conference scheduled for Wednesday, April 28, 2021 at 11:00 a.m. is hereby rescheduled to Wednesday, June 2, 2021 at 3:30 p.m. Counsel for the parties are directed to call Judge Parker's court conference line at the scheduled time. Please dial (866) 434-5269, Access code: 4858267.

**APPLICATION GRANTED**

Katharine H. Parker

Hon. Katharine H. Parker, U.S.M.J.

04/26/2021